

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Dennis Dela Cruz Fabian

: NO. 20-11120- AMC

: CHAPTER 13

Response to Motion for Relief filed by Toyota Motor Credit Corporation

Debtor, by and through her attorney, responds as follows:

1. Admitted

2. Denied. Scott Waterman is the Chapter 13 Trustee.

3-7. Admitted except that the loan is being paid its value plus interest in the plan.

8. Admitted, however, the debtor's income prevented the full payment and debtor has filed an amended plan that will pay Movant with interest.

9. Denied. That is the gross value due per the plan valuation with interest.

10. Denied. The agreed value in the confirmed plan was \$31,881.50.

11. Denied. The Modified Plan will pay Movant value plus interest.

Movant is adequately protected, there is equity in the real estate and the real estate is necessary to an effective reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly